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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: Removal Request for the Wach's Landfill,  
West Newton Township, Westmoreland County, PA

DATE: MAR 6 1987

FROM: Jack L. Downie, On-Scene Coordinator  
Emergency Response Section (3HW22)

*Conrad T. Hest for JLD*

TO: James M. Seif  
Regional Administrator (3RA00)

THRU: Stephen R. Wassersug, Director  
Hazardous Waste Management Division (3HW00)

*SR Wassersug*

I. PURPOSE

This is a removal request for funding to initiate a removal action at the Wach's Landfill, Westmoreland County, PA. This site contains materials actively leaking from deteriorating and open drums, approximately 200 in number, on the surface of the site. The site is directly accessible by the public. The requested funds in the amount of \$400,795 will be used to remove the drummed materials and any contaminated soil. This will mitigate the environmental threat posed by this site.

II. BACKGROUND

Wach's Landfill is located on Road #1 in the township of West Newton, Westmoreland County, PA, in a rural/residential area. There are three private residences in close proximity to the site, approximately as close as 200 yards.

Wach's Landfill is an active facility used for solid waste land-filling, junk storage and metal recycling operations. The landfill area operates under a PADER permit for solid wastes and covers 69 acres, of which 2 acres are used for landfilling and metal storage/recycling operations. Wach's Landfill is currently not an NPL site.

During Hurricane Agnes in 1972, drums were observed floating down Little Sewickly Creek, which runs adjacent to the site, and eventually into the Youghiogheny River. It is reported that most of the drums were pulled from Little Sewickly Creek during the hurricane, and these drums are now located on the Wach's Landfill property.

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Wach's Landfill is not currently on the National Priorities List (NPL), nor is it anticipated to be recommended for inclusion.

### III. THREAT

Wach's Landfill meets the criteria for removal action under the National Contingency Plan (50 Federal Register 47971; to be codified at 40 CFR 300.65), in that there is a potential threat to public health or welfare and/or the environment based upon factors (i) and (iv) of subpart (b)(2) as follows:

(i) Actual or potential exposure to hazardous substances by nearby populations, animals or food chain.

(iv) High levels of hazardous substances largely at or near the surface that may migrate.

Drums are both aggregated and scattered over a wide area which is unsecured. Many of the drums are deteriorated or leaking, and some had been previously opened by spiking, possibly contaminating soils in the area.

During the initial assessment, organic vapor readings between 250 units and 950 units (with 1 unit approximately equal to 1 part per million/ppm) were measured in the open drums, and readings between 0 units and 35 units were measured in the air around the drums.

Removal assessment analytical data has shown that 5 of the 6 drums screened have material with a flashpoint below 140°F, with one drum having a flashpoint as low as 39°F. The potential threat to public health from the drums is great due to the significant hazard of fire and/or explosion from the drum contents. PADER concurs that the drummed materials can be classified as RCRA waste based on the flammability analysis, and therefore constitute a hazard due to fire and/or explosion. The table below is a summary of analysis from the TAT site assessment conducted November 18, 1986. All results are in ppm.

Drum #	Flash Point (°F)	Benzene	Xylene	Toluene	Lead
WLDR01	160	440	6,500	ND	9,100
WLDR04	64	285	94,000	55,000	19,400
WLDR05	56	390	230,000	150,000	1,270
WLDR07	56	420	350,000	52,000	16
WLDR08	<40°F	690	190,000	94,000	144
WLDR09	116	600	2,500	55,000	30

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#### IV. PROPOSED PROJECT AND COSTS

The proposed project would assume that, based on data from previous assessments, all containers on the site are hazardous and will be evaluated after screening. The project will include sampling of drums and soils in the drum areas to determine drum contents and if leaking materials have contaminated soils.

Conditions of the area dictate that containers be freed from surrounding debris and overpacked, if necessary, before transport to the predesignated staging area.

Every effort will be made to ensure that drummed liquids will be taken off the site for incineration to comply with RCRA disposal regulations. All soils will be treated on the site by aeration and pH adjustment to ensure that all metals will be immobilized.

1. Extramural	
ERCS (labor, equipment, material, subcontract, drum characterization/staging, soil sampling, soil excavation; 21 days @ \$7,500/day)	\$157,000
Analytical	
150 drums samples @ \$400/sample	60,000
50 soil samples @ \$100/sample	5,000
Transportation/Treatment/Disposal	
150 drums @ \$500/drum (loaded rate)	75,000
app. 20 cu. yd. soil @ \$500/yd <sup>3</sup> (loaded rate)	10,000
ERCS Subtotal	\$307,500
TAT (2 personnel, 21 days)	\$ 25,000
USCG/AST (2 personnel, 21 days)	3,500
Extramural Subtotal	\$336,000
2. Intramural	
EPA (21 days, loaded rate)	
OSC	4,725
AFS	3,465
OPA	4,305
Intramural Subtotal	\$ 12,495
Project Subtotal	\$348,495
15% - EPA HQ	52,300
ESTIMATED PROJECT TOTAL	\$400,795

#### V. ENFORCEMENT

Due to the circumstances surrounding the incident, PADER is not pursuing the property owner as a potential responsible party.

Due to the same extenuating circumstances surrounding the site, the OSC does not intend to issue any "oral" or "written" notices to (compare CERCLA §107(b)(1)) potential responsible parties (PRPs). The OSC has advised the CERCLA Enforcement Section regarding the current situation.

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VI. STATE/LOCAL INVOLVEMENT

PADER has referred this site to the U.S. EPA Emergency Response Section (ERS). PADER has indicated that resources are not adequate to address this situation. Without the approval of CERCLA monies, no timely response action will be taken.

VII. PROJECT COMPLIANCE WITH REMEDIAL ALTERNATIVES

The proposed removal action will be consistent with any and all remedial alternatives that may be initiated for final site cleanup.

VIII. REGIONAL RECOMMENDATION

Because conditions at the Wach's Landfill meet the NCP Section 300.65 criteria for a Removal Action, I recommend your approval of this Removal Request. The estimated total project costs are \$400,795 of which \$307,500 is for the ERCS contractor.

You may indicate your approval or disapproval by signing below.

APPROVAL  DATE 3/11/87

DISAPPROVAL \_\_\_\_\_ DATE \_\_\_\_\_

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